

**MCCARTER
& ENGLISH**
ATTORNEYS AT LAW

USDC SDNY DOCUMENT ELECTRONICALLY FILED DOC #: DATE FILED: 6/17/11
--

June 16, 2011

VIA FACSIMILE (212-805-6382)

Hon. Victor Marrero
United States Courthouse
500 Pearl Street
New York, NY 10007

Re: Christian Louboutin S.A., et al. v. Yves Saint Laurent America, Inc., et al.
11 Civ. 2381 (VM)

Lee Carl Bromberg
Partner
T. 617.449.6538
F. 617.443.6161
LBromberg@mccarter.com

Dear Judge Marrero:

We are counsel for plaintiffs Christian Louboutin S.A., Christian Louboutin, L.L.C. and Christian Louboutin (collectively, "Louboutin") in the above trademark infringement, unfair competition and trademark dilution matter. Pending before the Court is Plaintiff's application for a preliminary injunction.

Pursuant to the Court's published *Individual Practices*, we are writing to request that the Court grant the parties an exception to the twenty-five (25) page limit for memoranda of law filed in support of a motion. Plaintiffs request that the parties each be permitted to file a forty-five (45) page memorandum of law in connection with the Plaintiffs' preliminary injunction application.

This is a factually intensive matter. Plaintiffs' filed their initial memorandum of law in support of their application for a preliminary injunction, which numbered thirty-five (35) pages, on April 7, 2011. At the Court's directive, the parties entered into a Stipulated Discovery and Briefing Schedule dated April 21, 2011 (the "Stipulation"), which the Court "so ordered."¹ Pursuant to the Stipulation, the parties conducted expedited discovery, and Plaintiffs are entitled to file an amended and updated memorandum of law in support of their motion for a preliminary injunction. Through the parties' expedited discovery, additional materials germane to Plaintiffs' presentation developed.

Counsel has conferred with defendants' counsel, who assent to this request.

Accordingly, Plaintiffs respectfully request that the Court permit the parties to each file a forty-five (45) page memorandum of law in connection with Plaintiff's application for a preliminary injunction.

¹ On June 15, 2011 the parties amended the Stipulation to adjust the briefing schedule slightly. The amended stipulation has been submitted to the Court for its consideration.

MCCARTER & ENGLISH, LLP
265 Franklin Street
Boston, MA 02110-3113
T. 617.449.6500
F. 617.607.9200
www.mccarter.com

BOSTON

HARTFORD

NEW YORK

NEWARK

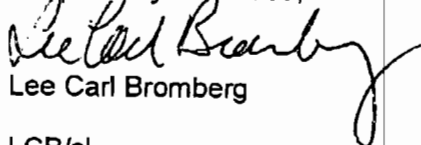
PHILADELPHIA

STAMFORD

WILMINGTON

Hon. Richard J. Holwell
June 16, 2011
Page 2

Respectfully submitted,


Lee Carl Bromberg

LCB/sl

cc: All counsel of record (by facsimile)

*Request DENIED. The Court notes that
plaintiffs' initial memorandum in sup-
port of injunctive relief exceeded the Court's
page limitation, without seeking prior
authorization. This case is no more fact
intensive than a number of other similar
cases.*
SO ORDERED: actions that are ~~for~~ ordered
by this court on motions that comply
with the 25-page limitation.
DATE 6-17-11 VICTOR MARRERO, U.S.D.J.